

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

The Lockformer Company  
Attn: J. R. Svehla  
711 Ogden Avenue  
Lisle, Illinois 60532

Application No.: 01050090

I.D. No.: 043055AAC

Applicant's Designation:

Date Received: May 25, 2001

Subject: Industrial Machinery Manufacturing

Date Issued:

Expiration Date:

Location: 711 Ogden Avenue, Lisle

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of:

- 1 Metal Cleaning Operation (Hand Wiping) (MC-1)
- 1 Coating Operation (CT-1) with Filters
- 1 Rustproofing Operation (RP-1)
- 1 Soil Vapor Extraction System with Electric Resistive Heating Controlled by a Carbon Adsorption System

pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for VOM, 10 ton/year individual HAP, 25 ton/year combined HAP). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2. This permit is issued based on the coating operation (CT-1) complying with the requirements of 35 Ill. Adm. Code 218.205(b)(1) requiring daily- weighted average VOM content of the "miscellaneous metal parts and products coating, extreme-performance, air-dried" coatings applied shall not exceed 3.5 lb VOM/gallon of coating (minus water and any compounds which are exempted from the definition of VOM) as applied when the coatings are averaged each day. This is an alternative emission limitation for the coatings emission limits established in 35 Ill. Adm. Code 218.204(j)(2)(A). Daily recordkeeping is required as specified in 35 Ill. Adm. Code 218.211(d) and this permit.

3. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

4. Emissions and operation of all coating operation (CT-1) shall not exceed the following limits:

Volatile Organic Material Usage		Volatile Organic Material Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>	<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
1.44	14.40	1.44	14.40

These limits are based on material balance at the maximum material usage indicated in the application. Compliance with annual limits shall be determined from a running total of 12 months of data.

- 5a. Emissions and operation of the rustproofing operations (RP-1) shall not exceed the following limits:

VOM/HAP Usage		VOM/HAP Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>	<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
0.05	0.50	0.05	0.50

These limits are based on material balance at the maximum material usage indicated in the application. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. This permit is issued based on the rustproofing coating operations complying with the requirements of the coatings emission limits established in 35 Ill. Adm. Code 218.980(d) that allows up to 2.5 ton/year of VOM from each emission unit and up to 5.0 ton/year from all such emission units.

- 6a. Emissions and operation of the Metal Cleaning (hand wiping) operations shall not exceed the following limits:

VOM/HAP Usage		VOM/HAP Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>	<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
0.24	2.40	0.24	2.40

These limits are based on material balance at the maximum material usage indicated in the application. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. This permit is issued based on the Metal Cleaning (hand wiping) operations complying with the requirements of the coatings emission limits established in 35 Ill. Adm. Code 218.980(d) that allows up to 2.5 ton/year of VOM from each emission unit and up to 5.0 ton/year from all such emission units.
- 7a. Prior to operating the soil vapor extraction system, the Permittee shall install a carbon adsorption system with a saturation indicator and recorder.
- b. The Permittee shall change the carbon filters prior to when the saturation indicator has indicated that the carbon bed is fully saturated.
- c. The Permittee shall keep records of the maintenance and operation of the carbon adsorption system including the replacement of the carbon filters. These records shall be retained for three years and shall be available for inspection by the Illinois EPA.
- 8. Pursuant to 35 Ill. Adm. Code Section 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in Sections 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of Subpart G shall apply only to photochemically reactive material.
- 9. In the event that the operation of this facility results in an odor nuisance or any other nuisance due to the operations described in the permit application, the Permittee shall take all appropriate and necessary actions, including but not limited to, changes in operating conditions or installation of controls, in order to eliminate the nuisance.
- 10. Emissions of volatile organic material (VOM) or Hazardous Air Pollutants (HAP) from the following equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Flow Rate (scfm)</u>	<u>VOM/HAP Emissions</u>	
		<u>(Ton/Month)</u>	<u>(Tons/Year)</u>
Soil Vapor Extraction System	4,600	0.66	6.60

These limits are based on maximum values for vacuum rate of 4,600 cfm, a soil gas concentration of 90 ppmv, continuous operations (8,760 hours per year), and a control efficiency of 83.5% from the carbon adsorption system, and information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

11a. Within 60 days of a written request from the Illinois EPA or USEPA, the volatile organic material emissions of the soil vapor extraction system with electric resistive heating controlled by a carbon adsorption system shall be measured during conditions which are representative of maximum emissions.

b. The following methods and procedures shall be used for testing of emissions unless another method is approved by the Illinois EPA: Refer to 40 CFR 60, Appendix A, and 40 CFR 61, Appendix B, for USEPA test methods.

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Flue Gas Weight	USEPA Method 3
Moisture	USEPA Method 4
Volatile Organic Material	USEPA Method 25, or Method 25A if outlet VOM < 50 ppmv as non-methane carbon

c. Copies of the Final Report(s) for these tests shall be submitted to the Illinois EPA with 14 days after test results are compiled and finalized. The Final Report shall include as minimum:

- i. A summary of results
- ii. General information
- iii. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule
- iv. Detailed description of test conditions, including
  - A. Process information, i.e., mode(s) of operating process rate, e.g. fuel or raw material consumption
  - B. Control equipment information, i.e., equipment condition and operating parameters during testing, and
  - C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair
- v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration
- vi. An explanation of any discrepancies among individual tests or anomalous data
- vii. The results of all quality control evaluation, including a copy of all quality control data.

- 12a. The Permittee shall maintain daily records of the following items:
- i. The name and identification of each coating, thinner and cleanup solvent used for coating operations;
  - ii. Daily records of each coating's usage (gallon/day, gallon/month and gallon/year);
  - iii. The VOM and HAP content of each coating, as applied (lb/gallon);
  - iv. Density of each applied coating (lb/gallon);
  - v. Daily-weighted-average VOM content of all coatings as applied each day; and
  - vi. VOM and HAP emissions (ton/month and ton/year).
- b. The Permittee shall maintain monthly records for the rustproofing operations of the following items:
- i. The name and identification of each VOM/HAP containing material used for rustproofing operations;
  - ii. VOM/HAP containing material usage (gallon/day, gallon/month and gallon/year);
  - iii. The VOM and HAP content of each material, as used (lb/gallon); and
  - iv. VOM and HAP emissions (ton/month and ton/year).
- c. The Permittee shall maintain monthly records of the metal cleaning (hand wiping) of the following items:
- i. The name and identification of each VOM/HAP containing material used for rustproofing operations;
  - ii. VOM/HAP containing material usage (gallon/day, gallon/month and gallon/year);
  - iii. The VOM and HAP content of each material, as used (lb/gallon); and
  - iv. VOM and HAP emissions (ton/month and ton/year).
- d. The Permittee shall maintain monthly records for the remediation system of the following items:
- i. Remediation system operating hours (hours/month and hours/year);
  - ii. Monitored soil gas/groundwater VOM and HAP concentrations (ppmv and µg/L, respectively); and
  - iii. VOM and HAP emissions (lb/month and tons/year).

13. All records and logs required by this permit shall be retained at a readily accessible location at the source for a period of 5 years for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to the Illinois EPA request for records during the course of a source inspection.
14. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
15. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Illinois EPA  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Illinois EPA  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

16. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: annual VOM, individual HAP and combined HAP emissions. If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.

Please note that the metal grinding, cutting and welding are exempt by 35 Ill. Adm. Code 201.146 (aa) and (y), respectively.

It should be noted that the issuance of this permit does not relieve the Permittee of the responsibility of complying with the provisions of the State of Illinois Rules and Regulations, Title 35: Subtitle C, Water Pollution Control, Chapter 1. The Permittee may need to obtain a permit from the Division of Water Pollution Control for operation of the wastewater pretreatment system and discharge tributary.

It should be noted that issuance of this permit does not relieve the Permittee from compliance with the 35 Ill. Adm. Code Part 731 Underground Storage Tanks or the permit requirements of Section 21 and 39 of the Environmental Protection Act with respect to a waste management operation, nor does it constitute a release from further responsibility for preventive or corrective action as defined under Section 4(y) of the Environmental Protection Act. Pursuant to 35 Ill. Adm. Code Part 731, approval may be required from the Bureau of Land - Leaking Underground Storage Tank Section (217/782-6761) prior to the installation of this equipment.

It should be noted that issuance of this permit does not relieve the Permittee from compliance with the permit requirements of Section 21 and 39 of the Environmental Protection Act with respect to a waste management operation, nor does it constitute a release from further responsibility for preventive or correction action as defined under Section 4(y) of the Environmental Protection Act. The Bureau of Land, Division of Remediation Management (217/782-6760) should be contacted prior to the installation of this equipment.

If you have any questions on this permit, please call John Blazis at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

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cc: Illinois EPA, FOS Region 1  
Illinois EPA, Compliance Section  
USEPA

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from operation of this industrial machinery manufacturing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario that results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels (i.e., 100 tons/year for VOM, 10 ton/year individual HAP, 25 ton/year combined HAP) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

1. Emissions and operation of all coating operation (CT-1) shall not exceed the following limits:

Volatile Organic Material Usage		Volatile Organic Material Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>	<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
1.44	14.40	1.44	14.40

2. Emissions and operation of the rustproofing operations (RP-1) shall not exceed the following limits:

VOM/HAP Usage		VOM/HAP Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>	<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
0.05	0.50	0.05	0.50

3. Emissions and operation of the Metal Cleaning (hand wiping) operations shall not exceed the following limits:

VOM/HAP Usage		VOM/HAP Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>	<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
0.24	2.40	0.24	2.40

4. Emissions of volatile organic material (VOM) or Hazardous Air Pollutants (HAP) from the following equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Flow Rate (scfm)</u>	<u>VOM/HAP Emissions</u>	
		<u>(Ton/Month)</u>	<u>(Tons/Year)</u>
Soil Vapor Extraction System	4,600	0.66	6.6



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5. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA.

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